

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

RECEIVED
JAN 16 1996
FCC MAIL ROOM

DOCKET FILE COPY ORIGINAL

Broadcast Services; Advanced Television	}	
Systems: Fourth Further Notice of Proposed	}	MM Docket No. 87-268; FCC 95-315
Rule Making and Third Notice of Inquiry	}	

INTERNATIONAL BROADCASTING NETWORK'S REPLY COMMENTS

I. Introduction

International Broadcasting Network (IBN), having earlier filed comments in this proceeding and having reviewed published summaries of comments filed by others, hereby submits its reply comments.

II. Review of IBN's Earlier Comments

IBN's earlier comments, which were received by the Commission on October 18, 1995, addressed three principal issues: (1) the impact that compulsory conversion to ATV would have upon the public, (2) the impact that mandatory conversion would have upon broadcasters and (3) the impact that such conversion would have upon the national economy. IBN concluded that the ATV proposals were inappropriate and should be rejected as being contrary to the public interest and destructive of the American system of universal, free, over-the-air television. Additionally, IBN cautioned that no proposal that excludes, deals unfairly with or endangers the nation's 1,648 low power television stations should be adopted.

III. Fallacies and Misconceptions Relied Upon by Proponents of ATV

Proponents of ATV have sought to convince the Commission that adoption of their proposals would have great benefits. These proponents apparently believe that the public wants ATV and is willing to pay for it. Likewise, they believe broadcasters want ATV and can bear the huge capital investments and operational expenses that would necessarily be incurred. They believe the national economy can withstand the high costs of mandatory conversion to ATV. They believe manufacturers will price their ATV receivers, recorders, cameras and related equipment and supplies reasonably despite the law of supply and demand and the pricing

0211

No. of Copies rec'd _____
List ABCDE _____

distortions that would ordinarily arise from the compulsory nature of the conversion. They believe there are no major environmental or health concerns relating to the substantial increases in electromagnetic radiation that would accompany the conversion. They believe the Grand Alliance technical standards are satisfactory and that there are no suitable alternatives. They believe compatibility with the NTSC analog system is unnecessary or unimportant. They believe the concerns of the computer industry and the movie producers are ill-founded. They believe it is appropriate to ignore the nation's 1,648 low power television stations and to stretch the term "secondary status" far beyond its original intent. Whether the proponents of ATV actually believe each of these propositions or simply want to make their case to further their own interests, they are, in IBN's considered opinion, relying upon fallacious assumptions and misconceptions.

IV. The Public Interest Must Prevail Over All Other Considerations

The issues in this proceeding are of immense importance. The preservation of America's system of universal, free, over-the-air television is at stake. Rural Americans and urban Americans alike must continue to have access to the flow of information that is provided by the nation's NTSC television system. The entire NTSC system, including the nation's 1,648 low power television stations as well as the nation's 1,539 full power stations and 4,770 translator stations, is a vital necessity and must not be sacrificed. The establishment of ATV as a replacement for the existing analog system would deprive large numbers of Americans of any affordable television service. For reasons of economics, ATV may never penetrate areas of low population density or areas that are economically depressed. Concentration of station ownership and control in the hands of a few large commercial enterprises having the financial muscle to dominate the television industry would be an inevitable result of adopting the present ATV proposals, and the diversity of viewpoint that is essential to the preservation of our democracy would be lost. The public interest demands that not a single station, whether full power or low power, be forced off the air in order to accommodate ATV. The public interest in preserving the NTSC television service clearly outweighs any conceivable advantage that any proponent of ATV might hope to gain. In the final analysis, the public interest must take precedence over every other consideration.

V. Conclusion

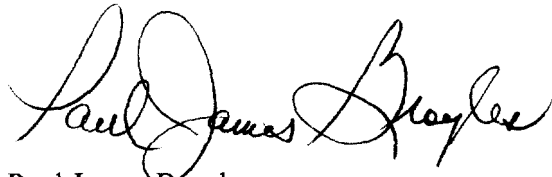
For the reasons stated above, and for the reasons stated in IBN's earlier comments, IBN respectfully urges that the Commission carefully consider the devastating impact that compulsory conversion from the existing NTSC television system to ATV would have upon consumers, broadcasters and the national economy, and that the Commission reject the present proposals for

mandatory conversion to ATV as being contrary to the public interest and inconsistent with the preservation of universal, free, over-the-air television.

Respectfully submitted,

INTERNATIONAL BROADCASTING NETWORK

By its President

A handwritten signature in black ink, reading "Paul James Broyles". The signature is written in a cursive, flowing style with large, connected letters.

Paul James Broyles

Post Office Box 691111

Houston, Texas 77269-1111

Telephone 713-251-1426

January 11, 1996